

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

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versus

CRIMINAL NO. 4:23CR358-6

JERREMY JAMES JENKINS

DEFENDANT'S MOTION TO BE RELEASED

TO THE HONORABLE JUDGE LEE H. ROSENTHAL:

COMES NOW, Defendant Jeremy James Jenkins, by and through his attorney of record, and hereby requests this honorable Court consider the merits of this motion and in turn grant this motion based upon the following:

Mr. Jenkins has been charged in a multi-count indictment of being part of a conspiracy to interfere with commerce by robbery, conspiracy to possess with intent to distribute a controlled substance, attempt to possess with intent to distribute a controlled substance, and possession of a firearm in furtherance of a drug trafficking crime. Mr. Jenkins was released originally on August 28, 2023, on a \$50,000 unsecured bond. Mr. Jenkins was arrested on January 29, 2024, based on a pretrial violation. A hearing was held on February 8, 2024, regarding the violation and Mr. Jenkins was released with additional conditions. Mr. Jenkins was then detained on October 1, 2024 by Magistrate Judge Andrew Edison due to new allegations of bond violations.

Mr. Jenkins is seeking release so he can attend the funeral of his grandmother, Pamela Gail Ellis, who passed away from kidney failure on June 23, 2025. Mrs. Ellis' wake and funeral is scheduled for Saturday July 5 at 10:00am at the Greater St. Paul Missionary Baptist Church located at 8309 Brandon St., Houston, Texas 77051.

In the alternative to release, Mr. Jenkins asks that he be escorted to the funeral by the U.S. Marshal service so that he can be with family during this time of mourning.

WHEREFORE, PREMISES CONSIDERED Defendant requests this Court consider the merits of this motion and, in turn, grant the same based upon the foregoing.

Respectfully submitted,

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez
State Bar of Texas: 24094996
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Friendswood, TX 77546
(832) 343-8023

Attorney for Defendant

CERTIFICATE OF SERVICE

I, Raymundo J. Vazquez, certify that a true and correct copy was delivered to the Government and current counsel via email on June 30, 2025.

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez

CERTIFICATE OF CONFERENCE

I, Raymundo J. Vazquez, have conferred with counsel for the Government and the Government is OPPOSED to this motion.

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez

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ORDER ON DEFENDANT'S MOTION TO SET BOND

The Court having considered the Motion hereby Orders:

The motion is Granted: Bond will be set at _____ and Defendant shall be released once the bond has been posted.

The alternative request is granted and the U.S. Marshals Service is to coordinate efforts through counsel to clothe and transport Mr. Jenkins to the funeral service on July 5, 2025.

A hearing on this matter will be held on _____ at _____ am/pm.

Lee H. Rosenthal
United States District Court Judge